

**UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ROBERT MELOCK,)	Case No. 1:24-cv-12679
)	
<i>Plaintiff,</i>)	
)	
v.)	Judge Sunil R. Harjani
)	
CITY OF WAUKEGAN, et al.,)	Magistrate Young B. Kim
)	
<i>Defendants.</i>)	JURY TRIAL DEMANDED
)	

**JOINT MOTION FOR ENTRY OF A CONFIDENTIALITY ORDER AND
A QUALIFIED HIPAA AND MENTAL HEALTH PROTECTIVE ORDER**

The Parties, by and through their respective counsel, jointly bring this motion for entry of an Agreed Confidentiality Order and a Qualified HIPAA and Mental Health Protective Order. In support of their motion, the Parties state as follows:

1. The Parties jointly seek a Confidentiality Order to permit the designation of materials sought in discovery in this case via discovery propounded to/from the Parties, as well as information sought by third parties via subpoena.

2. The Parties propose the Northern District of Illinois model confidentiality order with the addition of one agreed section by the parties—Section 4. Redaction of Personal Identifying Information. That section reflects a compromise struck by the parties regarding the redaction of personal identifying information for third parties. A copy of the proposed Agreed Confidentiality Order is attached as **Exhibit A**.

3. In addition, the Parties seek entry of a Qualified HIPAA and Mental Health Protective Order for the protection of confidential medical information pertaining to Plaintiff's

medical records. Given that this case involves allegations of physical, psychological, and emotional harm stemming from Plaintiff's arrest and subsequent wrongful conviction and incarceration for the 1989 murder of Augustine Melock, the parties anticipate that the scope of discovery will encompass production of Protected Health Information, including but not limited to nonpublic health information relating to the past, present, or future physical or mental condition of Plaintiff and the provision of care to Plaintiff.

4. A copy of the proposed Qualified HIPAA Protective Order is attached as **Exhibit B**.

5. All parties who have appeared in this litigation approve of the proposed Confidentiality Order and Qualified HIPAA Protective Order and to the Court's entry of the same.

WHEREFORE, the Parties jointly seek entry of the proposed Agreed Confidentiality Order (**Exhibit A**) and the Qualified HIPAA and Mental Health Protective Order (**Exhibit B**).

Date: August 25, 2025

Respectfully Submitted,

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s/ Ahmed A. Kosoko
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